

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**TEAL PEAK CAPITAL, LLC;**

Plaintiff,

v.

**ALAN BRAM GOLDMAN;**

Defendants.

Civil No. 3:20-cv-1747

Breach Of Contract; Specific  
Performance Of Contract;  
Reimbursement Of Funds, Costs  
And Expenses

**Motion for Extension of Time to Oppose  
Motion to Dismiss at ECF No. 63**

**To the Honorable Court:**

**Comes Now**, Teal Peak Capital, LLC ("TPC"), and through the undersigned attorney, respectfully states and prays:

1. On June 22, 2021, this Honorable Court granted TPC until July 6, 2021 to respond to Defendant's Motion to Dismiss the Amended Complaint. [ECF No. 63] Ordinarily, the time granted is more than sufficient for any party to respond. However, the undersigned has been tied up during the last two weeks in a preliminary injunction hearing currently being held before Magistrate Judge Marshal D. Morgan in *V. Suárez v. Camioneros Unidos, et al.*, 21-cv-01271-ADC-MDM. The preparation process, long hours at the Court and continuing need for research and additional motions have taken all our available time, particularly the time needed to respond to Defendant's Motion to Dismiss, which, although frivolous --in our view, requires a thorough response. After all, we are talking about a motion that seeks to deprive TPC from his day in court.

2. The injunction hearing is set to continue this Friday, July 9, and up to this day we have been working on a request to extend the already issued TRO. So, due to these unusual circumstances, we asked this Honorable Court to grant us an extension of time to respond to Defendant's Motion to Dismiss until Wednesday, July 14, 2021. We will do our best to file it before, but reality is we are not certain the injunction hearing will conclude on Friday. It most likely will continue until Monday.

**Wherefore**, TPC respectfully requests from this Honorable Court to grant it an extension until Wednesday, July 14, 2021 to respond to Mr. Goldman's requests for Dismissal of the Amended Complaint.

**Respectfully Submitted.**

In San Juan, Puerto Rico, this 6th day of July, 2021.

**I hereby certify** that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which will send notice of its filing electronically to the attorneys of record.

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s/Adrián Sánchez-Pagán

**Adrián Sánchez-Pagán**

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